

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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YONG XIONG HE,

Plaintiff,

ECF CASE

- versus -

No. 1:19-cv-05907-PKC-CLP

**CHINA NEW STAR RESTAURANT, INC.,
WAI SHUN CHAN (a/k/a Vincent Chan),
WAI LEUNG CHAN, and
WAI WEN CHAN (a/k/a Daniel Chan),**

Defendants.
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DECLARATION OF THOMAS CURTIN

Thomas Curtin declares, pursuant to the provisions of 28 U.S.C. §1746, as follows:

1. I am a legal assistant employed by Gladstein, Reif & Meginniss, LLP (“GRM”), counsel to Plaintiff Yong Xiong He (“Plaintiff” or “He”) in the above-captioned case.
2. In connection with this case and as further described below, I conducted searches of (a) certain property records, including deeds and mortgages, contained on the Automated City Register Information System (“ACRIS”) of the New York City Department of Finance, an internet database that permits one to search NYC property records associated with a particular street address by, among other means, using the address’s block and lot numbers, and (b) certain records on Spokeo, an internet database that permits one to find background information regarding individuals. All of the documents attached hereto were obtained by me in connection with these searches and were found on and printed from the ACRIS or Spokeo websites. I conducted these searches at the direction of Michael L. Winston, a GRM partner who is handling this case.

3. The ACRIS initial database search page is:

<https://a836-acris.nyc.gov/DS/DocumentSearch/Index>. One can use the Buildings Information System (“BIS”) of the NYC Department of Buildings to find out the block and lot numbers of a particular address. The BIS initial internet search page is:

<http://a810-bisweb.nyc.gov/bisweb/bsqpm01.jsp>.

4. The Spokeo initial database search page is:

<https://www.spokeo.com/>.

5. Documents I found on ACRIS in connection with 6309 Strickland Avenue, Brooklyn, NY (the “Strickland Ave. Property”) included:

(a) A deed dated July 10, 2007; a true and correct copy of this deed is attached hereto as Exhibit A.

(b) A deed dated November 25, 2019; a true and correct copy of this deed is attached hereto as Exhibit B.

6. As of the date of this declaration, there was no record on ACRIS of any mortgage that Wai Leung Chan or Po Kum Chan took out at any time that pledged the Strickland Ave. Property in connection with a loan.

7. Documents I found on ACRIS in connection with condo unit 6Q at 70 Washington Street, Brooklyn NY (the “Condo”) included:

(a) A deed dated June 22, 2016; a true and correct copy of this deed is attached hereto as Exhibit C.

(b) A mortgage dated June 22, 2016; a true and correct copy of this deed is attached hereto as Exhibit D. There is no record in ACRIS of any satisfaction of this mortgage.

(c) A deed dated November 25, 2019; a true and correct copy of this deed is attached hereto as Exhibit E.

8. Documents I found on ACRIS in connection with 8119 6th Avenue, Brooklyn, NY (the “6th Ave. Property”) included:

(a) A deed dated August 20, 2013; a true and correct copy of this deed is attached hereto as Exhibit F.

(b) A deed dated November 25, 2019; a true and correct copy of this deed is attached hereto as Exhibit G.

(c) A mortgage dated August 20, 2013; a true and correct copy of this deed is attached hereto as Exhibit H.

(d) An agreement dated December 26, 2019; a true and correct copy of this document is attached hereto as Exhibit I.

9. Documents I found on ACRIS in connection with 8804 16th Avenue, Brooklyn, NY (the “16th Ave. Property”) included:

(a) Detailed document information regarding a deed dated December 22, 1988; a true and correct copy of this ACRIS information is attached hereto as Exhibit J.

(b) A deed dated October 26, 1991; a true and correct copy of this deed is attached hereto as Exhibit K.

(c) A deed dated January 27, 2010; a true and correct copy of this deed is attached hereto as Exhibit L.

(d) Detailed document information regarding a mortgage recorded on ACRIS on December 30, 1988; a true and correct copy of this ACRIS information is attached hereto as Exhibit M.

(e) A discharge of mortgage dated October 29, 1993; a true and correct copy of this discharge of mortgage is attached hereto as Exhibit N. On November 25, 2019, and since then, there was no mortgage on this Property listed on ACRIS.

(f) A deed dated November 25, 2019; a true and correct copy of this deed is attached hereto as Exhibit O.

10. Documents I found on ACRIS in connection with 7814 16th Avenue, Brooklyn, NY:

(a) A deed dated September 4, 2014; a true and correct copy of this deed is attached hereto as Exhibit P.

(b) A mortgage dated September 1, 2019; a true and correct copy of this deed is attached hereto as Exhibit Q.

(c) An “assignment, mortgage” dated November 27, 2019; a true and correct copy of this document is attached hereto as Exhibit R.

11. Attached hereto as Exhibit S are certain pages from my Spokeo search regarding Wai Leung Chan.

12. Attached hereto as Exhibit T are certain pages from my Spokeo search regarding Ronald Chan.

13. Attached hereto as Exhibit U are certain pages from my Spokeo search regarding Roy Chan.


14. Attached hereto as Exhibit V are certain pages from my Spokeo search regarding Wai Shun Chan.

15. Attached hereto as Exhibit W are certain pages from my Spokeo search regarding Joseph Chan.

16. Attached hereto as Exhibit X are certain pages from my Spokeo search regarding Elton Chan.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on: July 2, 2020
New York, New York


Thomas Curtin